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9 Carolyn A. Dye, Chapter 7 Trustee

10 UNITED STATES BANKRUPTCY COURT

11 CENTRAL DISTRICT OF CALIFORNIA

12 LOS ANGELES DIVISION

13 In re:
14 URBAN COMMONS LLC,
15 Debtor.

Case No. 2:21-bk-13523-WB
Chapter 7

16 CAROLYN A. DYE, Chapter 7 Trustee,
17 Plaintiff,
18 v.

Adv. No. 2:23-ap-01254-WB
THIRD STIPULATION EXTENDING
DISCOVERY DEADLINE AND
CONTINUING PRETRIAL
CONFERENCE

19 JOSEPH FAN, an individual,
20 Defendant.

Pretrial Conference Hearing:
Date: January 7, 2025
Time: 2:00 PM
Place: 255 E. Temple St.
Los Angeles CA 90012
Ctrm: 1375

21
22 This Second Stipulation Continuing Pretrial Conference is
23 entered into between Plaintiff, Carolyn A. Dye, Chapter 7 Trustee
24 (the "Plaintiff") and Defendant Joseph Fan (the "Defendant"), by
25 and through their respective counsel. By this Stipulation, the
26 parties seek to extend the discovery cutoff to and including March
27 31, 2025, and continue the pretrial conference currently set
28 for January 7, 2025, at 2:00 p.m. to a date after March 31,
2025,

convenient to the Court.

The parties have engaged in good faith settlement discussions and believe that they might be able to settle this matter. However, the parties believe that before the settlement discussions can be more fruitful they will need to engage in further discovery to fully narrow the disputed issues that then may lead to a resolution of this matter.

SO STIPULATED

RESPECTFULLY SUBMITTED THIS 3rd DAY OF JANUARY, 2025,



LEONARD PEÑA
PEÑA & SOMA, APC
Attorneys for Defendant



JEFFREY NOLAN
PACHULSKI STANG ZIEHL
& JONES LLP
Attorneys for the Plaintiff

Date: January 3, 2025

Date: January 3, 2025

PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is: 479 South Marengo Ave., Pasadena, CA 91101

A true and correct copy of the foregoing document entitled (*specify*): **SECOND STIPULATION EXTENDING DISCOVERY DEADLINE AND CONTINUING PRETRIAL CONFERENCE** will be served or was served **(a)** on the judge in chambers in the form and manner required by LBR 5005-2(d); and **(b)** in the manner stated below:

1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF):

Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On (*date*) 1/3/2025, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

☒ Service information continued on attached page

2. SERVED BY UNITED STATES MAIL:

On (*date*) 1/3/2025, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

The Honorable Julia W. Brand
United States Bankruptcy Court
Edward R. Roybal Federal Building and Courthouse
255 E. Temple Street, Suite 1382
Los Angeles, CA 90012

☐ Service information continued on attached page

3. SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL (state method for each person or entity served):

Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on (*date*) _____, I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

☐ Service information continued on attached page

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

1/3/2025 NOEMI SANDOVAL

Date

Printed Name

/S/ NOEMI SANDOVAL

Signature

TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF):

Carolyn A Dye (TR) trustee@cadye.com, c197@ecfbis.com;atty@cadye.com

Jeffrey P Nolan on behalf of Defendant Joseph Fan jnolan@pszjlaw.com

Leonard Pena on behalf of Plaintiff Carolyn Dye

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United States Trustee (LA) ustpreion16.la.ecf@usdoj.gov